



Annual Performance Report Form

Facility Name: Kerr-McGee Chemical, LLC - FPD, Springfield, Missouri

Performance Track ID #: A070001

Annual Performance Report #: 1

Reporting Year: 2001

Due Date: April 1, 2002

Section A

General Facility Information

To the extent possible, EPA will pre-complete items A.1-A.8 for you. Please ensure that the information in A.1-A.8 below is accurate, complete, and up to date. Please supply or revise any information as necessary and then check the box to the left of the item(s) to indicate where changes have been made. Items A.9 and A.10 cannot be pre-completed; please respond as directed in A.9 and A.10 below.

Did you make changes? If so, check box.

- A.1 ☐ Name of your facility: Kerr-McGee Chemical LLC - FPD - Springfield, Missouri
- A.2 ☐ Name of your parent company: Kerr-McGee Corporation
- A.3 ☐ Facility contact person for the Performance Track program
Name: Mr./Mrs./Ms./Dr. Mr. Paul Bruemmer
Title: Facility Plant Manager
Phone: 417-831-2838 Fax: 417-863-8073 E-mail: pbruemmer@kmg.com
- A.4 ☐ Facility's location
Street Address: 2800 West High Street
Street Address (cont.):
City/State/Zip Code: Springfield, Missouri 65803
- A.5 ☐ Facility's website address (if any): na
- A.6 ☐ Number of employees (full-time equivalents) who currently work in the facility:
☒ Fewer than 50 ☐ 50 - 99 ☐ 100 - 499 ☐ 500 - 1000 ☐ More than 1000
- A.7 ☐ Does your company meet the Small Business Administration definition of a small business for your sector? ☐ Yes ☒ No
- A.8 ☐ North American Industrial Classification System (NAICS) Code(s) that are used to classify business at the facility: 321114 _____
- A.9 ☐ In your application and, perhaps, in previous annual performance reports, you described what your facility does or makes. Have there been any (additional) changes to your facility's list of products and/or activities? If so, please list them in the space below. ☐ Yes ☒ No
- A.10 ☐ Please update the list of environmental requirements that apply to your facility. In the space below, indicate any changes that have taken place during this reporting period. If you have no changes to report, please write "No changes."
No changes

Section B

Environmental Management System

B.1 Environmental Management System Assessment. Please summarize EMS assessments conducted *during the year*. Attach additional sheets as necessary.

a. Was an EMS audit or other assessment done by an independent third party?

☒ Yes ☐ No

If yes, please provide the *type* (e.g., ISO 14001 certification), the *scope*, and the *dates* (mo/yr) of each assessment.

A recertification audit was conducted of our integrated ISO 9002-1994 and ISO 14001-1996 management systems. This audit was conducted on November 12th and 13th of 2001. The scope of our ISO 14001 program is as follows: The environmental management system of Kerr-McGee Chemical LLC's plant in Springfield, Missouri associated with the manufacture of treated railroad crossties and switchties.

b. Was an internal or corporate EMS audit conducted? ☒ Yes ☐ No

If yes, please provide the *scope* and the *dates* (mo/yr) of each audit.

An internal audit was conducted of our integrated ISO 9002-1994 and ISO 14001-1996 management systems. This audit was conducted on March 5th and 6th of 2001. The scope is the same as identified in a. above.

c. Was a compliance audit conducted? ☒ Yes ☐ No

If yes, please provide the *scope* and the *dates* (mo/yr) of each audit, and indicate *who* conducted the audit(s) (e.g., facility staff, corporate groups, third party).

Region VII USEPA conducted a compliance assistance audit on June 25th and 26th, 2001. The focus of their inspection was RCRA compliance and SPCC compliance.

d. (Optional) If you would like to describe any other audits or inspections that were conducted at your facility, please do so here.

None

Section B

(continued)

B.1

e. Briefly summarize corrective actions taken and other improvements made as a result of your EMS assessments and compliance audits.

As noted from the inspection there were several areas noted in the plant that appeared to have visible staining of the soil. These areas were excavated and properly disposed of. Procedural changes were also implemented to prevent future staining. A new drip pad coating and method of loading material will be implemented in 2002 that will further enhance our ability to prevent staining. Procedural changes were also made to improve our SPCC plan.

f. Has your facility corrected all instances of potential non-compliance and EMS non-conformance identified during your audits and other assessments?

☒ Yes ☐ No ☐ No such instances identified

If no, please explain your plans to correct these instances.

g. When was the last Senior Management review of your EMS completed? *mo/yr* October 2000

Who headed the review?

Name: Mr./Mrs./Ms./Dr. Mr. Gary Davis

Title: SH&E Support Staff Hazardous Materials and Transportation Specialist

Section B

(continued)

B.2 ISO 14001 Certification. Is your facility currently certified to ISO 14001? ☒ Yes ☐ No

B.3 Environmental Aspects Identification. When did your facility last conduct a systematic identification and/or review of your environmental aspects? *mo/yr* January 2002

B.4 Progress Toward Achieving Objectives and Targets. In the table below, please provide a narrative summary of progress made toward EMS objectives and targets. **You may limit the summary to environmental aspects that are *significant* and towards which *progress* has been made during the reporting year.** In cases where progress relates specifically to a Performance Track performance commitment, complete the *Environmental Aspect* column, but in the *Progress* column simply refer to the performance commitment tables in Section C, i.e. "See Section C." Attach additional sheets as necessary.

<i>Environmental Aspect</i>	<i>Progress Made This Year</i> (e.g., quantitative or qualitative improvements, activities conducted)
Emissions of VOCs	See performance commitment tables in section C.
Hazardous Waste Generation	See performance commitment tables in section C.
Discharge of Toxics to Water	See performance commitment tables in section C.
Emissions of Toxics from Doors (HAPS)	See performance commitment tables in section C.

Section C

Environmental Performance Commitments

Please use the tables on pages 6-9 to summarize your facility's environmental performance against your Performance Track performance commitments. Complete only those boxes related to the baseline, current year, and performance commitment. If any of the boxes have been pre-completed for you, please verify the information. If you find information that is incorrect, cross it out and write in the correct information. **Leave blank any columns for future reporting years.**

C.1

Performance Commitment 1

a. Use this table to report data related to your first performance commitment.

Category (see page 16 of the instructions): Air Emissions

Aspect (see page 16 of the instructions): Emissions of VOCs

	<i>Baseline (as stated in your application)</i>	<i>Year 1</i>	<i>Year 2</i>	<i>Year 3</i>	<i>Performance Commitment (the goal stated in your application)</i>
<i>Calendar Year</i>	1999	2001			2003
<i>Actual Quantity (per year)</i>	1900	1198			1615 (optional)
<i>Measurement Units</i>	lbs of VOCs				
<i>Normalizing Factor*</i>	1.0	.81			1.0 (optional)
<i>Basis for your Normalizing Factor*</i>	production (cubic feet of wood treated)				
<i>Normalized Quantity* (per year)</i>	1900	1479			1615

*See pages 17-19 of the instructions for more information

b. Briefly describe how you achieved improvements for this aspect or, if relevant, any circumstances that delayed progress.

The evaluation of creosote formulation and the development of new emissions modeling based on the reformulated raw product led to this successful reduction.

c. Please list any other EPA voluntary programs to which you are also reporting these data (e.g., Energy Star, Project XL).

None

Section C

(continued)

C.2 Performance Commitment 2

a. Use this table to report data related to your second performance commitment.

Category (see page 16 of the instructions): Waste					
Aspect (see page 16 of the instructions): Hazardous Solid Waste					
	<i>Baseline (as stated in your application)</i>	<i>Year 1</i>	<i>Year 2</i>	<i>Year 3</i>	<i>Performance Commitment (the goal stated in your application)</i>
<i>Calendar Year</i>	1999	2001			2003
<i>Actual Quantity (per year)</i>	22263	37895			18924 (optional)
<i>Measurement Units</i>	lbs of HW generated				
<i>Normalizing Factor*</i>	1.0	.81			1.0 (optional)
<i>Basis for your Normalizing Factor*</i>	Production (cubic feet of wood treated)				
<i>Normalized Quantity* (per year)</i>	22263	46784			18924
*See pages 17-19 of the instructions for more information					

b. Briefly describe how you achieved improvements for this aspect or, if relevant, any circumstances that delayed progress.

Clean-up of stained soils generated more than expected. Raw product problems also contributed to the increased generation of hazardous waste due to clean-up sludge and debris.

c. Please list any other EPA voluntary programs to which you are also reporting these data (e.g., Energy Star, Project XL).

None

Section C

(continued)

C.3

Performance Commitment 3

a. Use this table to report data related to your third performance commitment.

Category (see page 16 of the instructions): Discharges to Water

Aspect (see page 16 of the instructions): Discharges of Toxics to Water

	<i>Baseline (as stated in your application)</i>	<i>Year 1</i>	<i>Year 2</i>	<i>Year 3</i>	<i>Performance Commitment (the goal stated in your application)</i>
<i>Calendar Year</i>	1999	2001			2003
<i>Actual Quantity (per year)</i>	2700	1933			2295 (optional)
<i>Measurement Units</i>	lbs of oil&grease				
<i>Normalizing Factor*</i>	1.0	.81			1.0 (optional)
<i>Basis for your Normalizing Factor*</i>	Production (cubic feet of wood treated)				
<i>Normalized Quantity* (per year)</i>	2700	2368			2295
*See pages 17-19 of the instructions for more information					

b. Briefly describe how you achieved improvements for this aspect or, if relevant, any circumstances that delayed progress.

Closely monitored wastewater operations and worked at operating the system as efficiently as possible.

c. Please list any other EPA voluntary programs to which you are also reporting these data (e.g., Energy Star, Project XL).

None

Section C

(continued)

C.4 Performance Commitment 4

a. Use this table to report data related to your fourth performance commitment.

Category (see page 16 of the instructions): Air Emisisions

Aspect (see page 16 of the instructions): Emissions of Toxics (HAPS) from Retort Doors

	<i>Baseline (as stated in your application)</i>	<i>Year 1</i>	<i>Year 2</i>	<i>Year 3</i>	<i>Performance Commitment (the goal stated in your application)</i>
<i>Calendar Year</i>	1999	2001			2003
<i>Actual Quantity (per year)</i>	557	130			473 (optional)
<i>Measurement Units</i>	lbs of HAPs				
<i>Normalizing Factor*</i>	1.0	.81			1.0 (optional)
<i>Basis for your Normalizing Factor*</i>	Production (cubic feet of wood treated)				
<i>Normalized Quantity* (per year)</i>	557	160			473

*See pages 15-17 of the instructions for more information

b. Briefly describe how you achieved improvements for this aspect or, if relevant, any circumstances that delayed progress.

The reduction comes from reduced door cylcle time from improved efficiencies and employee involvement and the reformulation of cresote.

c. Please list any other EPA voluntary programs to which you are also reporting these data (e.g., Energy Star, Project XL).

None

Section D

Public Outreach and Performance Reporting

D.1

Please briefly summarize the public outreach and reporting activities that your facility has conducted during the year. Feel free, but not obligated, to attach supporting materials (e.g., meeting agendas, public announcements).

The plant conducts an annual Halloween Open House. Over 500 of the surrounding neighbors are invited to the facility. Following fun and festivities for the kids, neighbors are invited to attend a plant tour to view the operations and learn about our commitments to environmental performance.

The plant manager has been the Chair of the Local Emergency Planning Committee. He now maintains the position of secretary.

The fire department regularly visits the plant for site reviews to maintain familiarity for safety and environmental concerns.

We regularly host 2 or more student visits throughout the year. This gives us an opportunity to share our plant and successes with the younger members of our community.

We also meet with neighbors and regulators as needed or as requested.

D.2

Please indicate which of the following methods your facility plans to use to make its Performance Track Annual Performance Report available to the public. Please check as many as are appropriate.

☐ Website (URL)

☒ Open House

☒ Meetings

☐ Press Releases

☐ Community Advisory Panel

☒ Other Trade Association

Section E

Self-Certification of Continued Program Participation

On behalf of Kerr-McGee Chemical LLC, Springfield, Missouri,
(name of my facility)

I certify that

- ◆ I have read and agree to the terms and conditions specified in *the National Environmental Performance Track Program Guide*. This facility, to the best of my knowledge, continues to meet all program criteria;
- ◆ I have personally examined and am familiar with the information contained in this Annual Performance Report. The information contained in this report is, to the best of my knowledge and based on reasonable inquiry, true, accurate, and complete;
- ◆ My facility has an environmental management system (EMS), as defined in the Performance Track EMS criteria, including systems to maintain compliance with all applicable federal, state, tribal, and local environmental requirements in place at the facility, and the EMS will be maintained for the duration of the facility's participation in the program;
- ◆ My facility has conducted an objective assessment of its compliance with all applicable federal, state, tribal, and local environmental requirements; and the facility has corrected all identified instances of potential or actual noncompliance; and
- ◆ Based on the foregoing compliance assessments and subsequent corrective actions (if any were necessary), my facility is, to the best of my knowledge and based on reasonable inquiry, currently in compliance with applicable federal, state, tribal, and local environmental requirements.

I agree that EPA's decision whether to accept participants into or remove them from the National Environmental Performance Track is wholly discretionary, and I waive any right that may exist under any law to challenge EPA's acceptance or removal decision.

I am the senior manager with responsibility for the facility and am fully authorized to execute this statement on behalf of the corporation or other legal entity whose facility is part of the National Environmental Performance Track program.

Signature/Date _____

Printed Name Mr./Mrs./Ms./Dr. Paul R. Bruemmer

Title Plant Manager

Phone Number/E-mail Address 417-831-2838/pbruemmer@kmg.com

Facility Name Kerr-McGee Chemical LLC

Facility Street Address 2800 West High Street Springfield, Missouri 65803

Performance Track Identification Number A070001

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The public reporting and recordkeeping burden for this collection of information is estimated to average 188 hours per respondent annually. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number.

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